

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

**KITHNOS SPECIAL MARITIME
ENTERPRISE, *et al.*,**

Plaintiffs,

M/V KITHNOS (IMO 9711523), *et al.*

Defendants.

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CIVIL ACTION NO. 2:25-cv-00042

ADMIRALTY RULE 9(h)

DAILY JOINT STATUS REPORT FOR JULY 18, 2025

Pursuant to the Court's Order [Document 158] the parties submit the following Daily Joint Status Report regarding the parties' progress in (1) substituting new crew onto the Vessel; (2) repatriating the current crew; and (3) turning over the necessary documents for the operation of the Vessel. It has been agreed by the parties to follow the following procedures in compiling and submitting the daily joint status reports:

- Each party will submit their portion of the daily status report to Kelly M. Haas, NMS Counsel, by 2:00 PM CST.
- Ms. Haas will compile the joint status report and will serve the daily report upon all counsel of record via the Court's Case Management/Electronic Case Files (CM/ECF) system by 4:00 PM CST.
- Each party can comment/respond on another party's submission the following day, if needed.

**I.
STATUS UPDATES**

PLAINTIFFS

Plaintiffs are working with V.Ships and OCM on the necessary paperwork regarding registry with the Greek Ministry.

Status of Requested Documents:

Plaintiffs intend to meet and confer with Claimant's counsel regarding the remaining documents/information required by VShips.

Repatriation:

Regarding NMS' request in the July 16 status report for information for the three crew members, Plaintiffs provided the information to NMS.

Further, efforts to obtain signatures of the crew to the crew release letters remain ongoing. At the time of this writing, 19 releases have been signed, and the remainder are expected to be received today. Once the crew letters have been received, the balance of wages payment is intended to be facilitated. Proof of payment thereof is intended to be provided to the crew prior to leaving the vessel. Further, airplane tickets to repatriate the crew have been booked.

CLAIMANT

Repatriation: It is the Claimant's understanding that the first set of crewmembers will disembark the vessel on Wednesday, July 23, 2025. It is also the Claimant's understanding that each disembarking crewmember will receive a letter from NMS that is similar to the example included in NMS's Daily Report filed yesterday.

Technical Manager: It is the Claimant's understanding that the steps to designate the new technical manager are being undertaken by the Plaintiffs and/or OCM with the appropriate Greek authorities. No actions are being taken by the Claimant or anyone else acting on its behalf to interfere with this process. Prior to the Master departing, the Claimant will require written confirmation that the new technical manager has been formally registered with the appropriate Greek flag authorities.

Documents: The Claimant will seek to meet with the Plaintiffs to resolve any remaining document issues.

OCM MARITIME GAS 4 LLC

OCM Maritime Gas 4 LLC ("OCM") reports that it has not yet received payment of the amount due now (\$2,047,486.01) to OCM to fulfill the condition for release of the Vessel pursuant to Condition No. 15 in the Order Releasing Vessel (D.E. 114). Plaintiffs' counsel responded in an email last night to OCM's repeated questions why has the payment not been made and when will it be made. Plaintiffs' response said the "money will be paid promptly from the hire revenue." OCM's counsel replied to Plaintiffs' counsel today, stating OCM's understanding is that the Court's Order Releasing Vessel clearly requires the payment due now to be paid before the Vessel can be released pursuant to the Order.

OCM's counsel has requested several times that Plaintiffs provide a copy of the crew list for the replacement crew, but the crew list has not been provided yet. Plaintiffs' counsel's email last night said they would provide the crew list "as soon as able." OCM continues to await the crew list.

Last night, Plaintiffs' counsel provided OCM with a redacted copy of the Management Agreement dated July 5, 2025 between ITM/V.Ships and Kithnos SME. Counsel for OCM and Plaintiffs are engaging in discussions about the terms of this management contract. OCM reports that the copy provided is redacted so it does not show the management fee amount and several monetary terms regarding fees and expenses. OCM requested an unredacted copy to show all relevant monetary terms. OCM believes this information will have to be disclosed to enable transparency for all parties and the Court of the accounting records for handling the revenues and expenses and the bank account in this District pursuant to the Order Releasing Vessel Condition Nos. 6 and 8.

NATIONAL MARITIME SERVICES

Representatives with NMS, Eletson Holdings, and Valls Ship Agencies are diligently working to secure CBP approval and for the following crewmembers to disembark as a group from the KITHNOS on Wednesday, July 23, 2025:

KITHNOS			
	Full name	Nationality	Rank
1	Manolarakis Konstantinos	HELLENIC	MASTER
2	Sokur Dmytro	UKRAINE	CHIEF OFFICER
3	Papanikolaou Ioannis	HELLENIC	2ND OFFICER
4	Kalyviotis Grigorios	HELLENIC	2ND OFFICER
5	Karatsolias Panagiotis	HELLENIC	DECK CADET
6	Vlaikos Dimitrios	HELLENIC	CHIEF ENGINEER
7	Fatun Mykhaylo	UKRAINE	2ND ENGINEER
8	Kainourios Dimitrios	HELLENIC	3RD ENGINEER
9	Vasylenko Yehor	UKRAINE	GAS ENGINEER
10	Zlatov Ruslan	UKRAINE	ELECTRICIAN
11	Bare Jerry Maluto	FILIPINO	BOSUN
12	Lacuadra Jeoffrey Merin	FILIPINO	ABLE SEAMAN
13	Costumbrado Joseph	FILIPINO	ABLE SEAMAN
14	Oroga Patrick Joseph Zabala	FILIPINO	ABLE SEAMAN
15	Manalo Aaron Jasper	FILIPINO	ORDINARY SEAMAN
16	Algire Alejandro	FILIPINO	ORDINARY SEAMAN
17	Urfilla John Lester Vegafria	FILIPINO	OILER
18	Marquez Ben Mark Corpin	FILIPINO	WIPER
19	Ilag Kenneth Jay Manalo	FILIPINO	COOK

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Arevalo Joshua Sustiger

FILIPINO

ASS. STEWARD

Alan Swimmer (NMS) and Kelly Haas (SBSB Eastham) will board the vessel on Monday, July 21, 2025 to discuss the status of the planned travel arrangements and to provide each crew member with individual letters regarding recommendations for C/D Nonimmigrant Visas for use in renewing their visas at a later date.

Respectfully submitted,

For Plaintiffs:

/s/ Edward W. Floyd *

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For OCM Maritime Gas 4 LLC:

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* Signatures of the respective parties are only for that party's daily submission and not an indication of its agreement with the submissions of the other parties.

CERTIFICATE OF SERVICE

I certify that on July 18, 2025, a true copy of the foregoing document was served upon all counsel of record via the Court's Case Management/Electronic Case Files (CM/ECF) system and email.



KELLY M. HAAS